

New Hampshire Regional Haze SIP Revision Summaries of Conference Calls with Federal Land Managers

August 28, 2008, and September 18, 2008

Conference calls with the Federal Land Managers (FLMs) were arranged on two separate dates to discuss New Hampshire's draft Regional Haze SIP. The first conference call covered all aspects of the plan except BART. The second conference call focused on New Hampshire's BART analyses.

Conference Call – August 28, 2008

Attendees:

USDOJ, National Park Service – Bruce Polkowsky, Holly Salazer
USDOJ, Fish and Wildlife Service – Tim Allen
USDA, Forest Service – Anne Acheson, Scott Copeland
USEPA – Anne Arnold, Anne McWilliams
NHDES – Andy Bodnarik, Charlie Martone, Jeff Underhill

Notes:

On August 27, 2008, the day before the conference call, NHDES received preliminary comments on the draft SIP by email from the U.S. Department of the Interior (DOI), National Park Service (NPS) and U.S. Fish and Wildlife Service (FWS). On the day of the call, NHDES received preliminary comments by email from the U.S. Department of Agriculture, U.S. Forest Service (USFS). The ensuing discussion during the call indicated the consensus of the FLMs that the draft SIP was well written and comprehensive but needed some “slight adjustments.”

The call began with a general discussion of the overall SIP process with special reference to the vacatur of CAIR. All parties agreed that the vacatur was a major issue that needed to be addressed in the SIP but was not sufficient reason to delay moving toward completion of the SIP. It was noted that New Hampshire's draft plan was heavily dependent on implementation of CAIR by upwind states, even though New Hampshire was not a CAIR state itself.

It was suggested that New Hampshire's SIP make reference to CAIR up front, address the uncertainty created by the vacatur, and include a commitment to review the situation as it evolves. The review would include an updating of emission inventories, a check of other states' SIPs to determine whether the MANE-VU “Ask” (or equivalent measures) was incorporated, a comparison of “where we are now versus where we thought we would be,” and appropriate revisions to the SIP by the first progress report due in 2012.

The remainder of the call was devoted to specific points raised by the FLMs in their emailed preliminary comments. New Hampshire's responses to these comments are provided in the accompanying document, “New Hampshire Regional Haze SIP Revision: Response to Federal Land Managers' Comments.” Some additional points arising from the conference call were as follows:

- It was suggested that 1996 and 1999 national emissions inventory data were extraneous and could be removed from the SIP.
- A VISTAS report on smoke emissions (from prescribed fires and woodstoves) was available and might serve as a useful reference to New Hampshire.

- CALMET and CALPUFF were not modeled by MANE-VU exactly per EPA guidance. This distinction should be explained in the text.
- The SIP includes no contingency plan for discontinuance of monitoring sites. In the event of reduced federal funding or other cause, New Hampshire should consult with the FLMs on what actions could be taken to avoid loss of monitoring data.
- It should be noted in the SIP that Prevention of Significant Deterioration and regional haze planning are complementary programs.
- Final comments from USDA would be delayed perhaps 90 days.

Conference Call – September 18, 2008

Attendees:

USDOJ, National Park Service – Bruce Polkowsky, Holly Salazer

USDOJ, Fish and Wildlife Service – Sandra Silva

USDA, Forest Service – Scott Copeland

USEPA – Anne McWilliams

NHDES – Andy Bodnarik, Charlie Martone, Gary Milbury, Jeff Underhill

Notes:

This conference call was reserved for discussion of New Hampshire's BART analyses. NHDES received draft comments on the BART analyses from the National Park Service by email on September 16, 2008. Discussion during the conference call adhered closely to, and reiterated points contained in, the written comments. As a general comment, it was stated that New Hampshire's BART analyses needed more documentation and fine-tuning, with greater detail in the description of sources. It was requested that New Hampshire submit draft permits for the BART sources to the FLMs when the drafts become available.

The parties acknowledged that the latest projected costs of SO₂ scrubber controls for Merrimack Station were very high at around \$1,000/kW – about triple what they were when first estimated in 2003. NPS has found that SO₂ scrubbers for other BART-eligible facilities typically have cost half this amount or less, but costs have been rising sharply. It was suggested that the BART analyses focus not just on incremental costs.

Some recent BART analyses conducted elsewhere have evaluated the project costs in terms of dollars per deciview of visibility improvement. BART control costs have been reported to be on the order of \$10-15 million per deciview.

New Hampshire's responses to specific points raised by the FLMs in their emailed comments may be found in the accompanying document, "New Hampshire Regional Haze SIP Revision: Response to Federal Land Managers' Comments."

Postscript:

The day after September 18 conference call, Don Shepherd sent an email to NHDES providing technical information and costs on BART proposals for facilities in other parts of the country.

NHDES received final comments from DOI – NPS in a letter dated September 26, 2008. The final comments were not substantially changed from the preliminary comments received earlier.